

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA

IN RE: ) Case No. 19-05007-jw<sup>1</sup>  
CANDACE ANITREL PAGE ) Chapter 13  
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                        )  
                        )  
                        )

**CONSENT ORDER SUBSTITUTING COUNSEL**

This matter comes before the Court upon the consent of Jason Moss of Moss & Associates, Heather S. Bailey of Bailey Law Offices, LLC, and Debtor(s) to substitute Debtor(s)' counsel.

Pursuant to the settlement agreement reached between Moss & Associates and Ms. Bailey which has been adopted as an order of the Court, the parties request with the consent of Debtor(s) and the Court hereby orders that Heather S. Bailey of Bailey Law Offices, LLC be substituted as counsel for the Debtor(s) in the attached list of cases.

As previously expressed in the Court's prior order, the payments of attorney's fees and costs in the cases subject to this Consent Order are to be paid in the following manner:<sup>2</sup>

- a. **Pre-Confirmation Cases:** In cases in which a chapter 13 plan has not been confirmed, Moss & Associates shall retain any payments made to it prior to the entry of the Consent Order. After the entry of this Consent Order, the fee agreement, if in accordance with South Carolina Local Bankruptcy Rules and Chambers Guidelines, between Bailey Law Offices, LLC and the client will determine the fees for its work in the case thereafter.
- b. **Post-Confirmation Cases:** In cases in which a chapter 13 plan has been confirmed, Moss & Associates shall be timely paid as a priority expense the entire fee agreed to it

<sup>1</sup> This matter involves numerous cases. A list of the cases applicable to this Consent Order is attached hereto.

<sup>2</sup> The terms of this agreement regarding the payment of attorney's fees have been presented to the Debtor(s) who are substituting counsel.

in its retainer and representation agreement (the Expedited Fee Amount under SC LBR 2016-1(b)(1) and any supplemental fees earned but not yet paid at the time the of the entry of the Consent Order). After the entry of the Consent Order, the fee agreement, if in accordance with South Carolina Local Bankruptcy Rules and Chambers Guidelines, between Bailey Law Offices, LLC and the client will determine the fees for its work in the cases thereafter.<sup>3</sup>

An indication of the Debtor(s)' consent to this substitution of counsel is attached to this Consent Order.

**WE SO MOVE:**

By: *Heather S. Bailey, ESQ.*

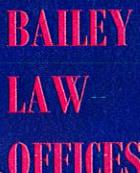
Heather S. Bailey (ID # 11592)  
Bailey Law Offices, LLC  
Post Office Box 60821  
North Charleston, SC 29419  
843-256-6116

By:

*Jason T. Moss*  
Jason T. Moss (ID # 7240)  
Moss & Associates Attorneys, P.A.  
816 Elmwood Avenue  
Columbia SC 29201  
Telephone: (803) 933-0202

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<sup>3</sup> Moss & Associates agrees not to assert an interest in the supplemental fees for services performed after the entry of an Order Substituting Counsel by Bailey Law Offices, LLC.



11/22/2019

**RE: OFFICIAL UPDATE REGARDING YOUR CASE**

Dear valued client,

As you are aware, I am your attorney of record. I want to inform you that as of 11/20/2019, after 13 years, I officially resigned from the law firm, Moss & Associates, PA located at 2170 Ashley Phosphate, Suite 405, North Charleston. I am now helping debtors at my own private practice, Bailey Law Offices, LLC located nearby at 3422 Rivers Ave., North Charleston.

You have the right to choose your attorney. You may continue to retain me, Attorney Heather S. Bailey, or you may choose to have Jason Moss, Moss & Associates or another attorney unrelated to myself or Moss & Associates represent you. A prompt response is imperative in order to ensure your files are available to the attorney you choose as there may be deadlines affecting your case.

Please sign/date and return this letter as soon as possible via the email address below or via mail to PO Box 60821, North Charleston, SC 29419. You may also text or call (843) 256-6116 to ask questions or inform me of your decision while I await your response in writing or via email.

*As your attorney of record, I am fully prepared to continue to represent you; however, your selection of representation is required for access to your case file.*

Respectfully,

Miss Heather Bailey, Esq.

I wish for my case to remain with Attorney Heather S. Bailey

I wish for my case to be taken over by Jason Moss, Moss & Associates

I wish to find another attorney

11/27/2019

Date

DocuSigned by:

A handwritten signature in black ink, appearing to read "Candace Page".

FFCE93A9A80C4DA...

Signature

Candace Page

Full Name (Printed)

**YOUR PROMPT ATTENTION REQUIRED AND MUCH APPRECIATED**



PO BOX 60821  
North Charleston, SC 29419



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